

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**UNITED STATES OF AMERICA**  
**Plaintiff,**

**v.**

**DANIEL TOHME POSADA,**  
**Defendant.**

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**CAUSE NO. EP-22-CR-1944-KC**

**NOTICE TO THE COURT REGARDING MOTION TO MODIFY**

COMES NOW Defendant and files this, his Notice to the Court and shows the following:

On July 11, 2025, Defendant filed a Motion to Modify Conditions of Supervised Release to permit international travel. At the time of filing, the supervising United States Probation Officer had not responded to counsel's inquiry, and the motion was therefore submitted without her position.

Later, on July 11, 2025, the probation officer contacted undersigned counsel's office via telephone and conveyed that she is not opposed to the requested modification. She also expressed a desire to speak directly with counsel regarding the motion. This Notice is submitted to inform the Court of the probation officer's position.

WHEREFORE, premises considered, Defendant respectfully requests that the Court receive the instant notice. Defendant also prays for all other relief to which Defendant may be entitled in both equity and law.

Respectfully submitted,

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/s/ Felix Valenzuela  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 14, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and also transmitted the foregoing via email to Phillip.Countryman@usdoj.gov.

/s/ Felix Valenzuela